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*Attorneys for the LeFever Mattson Debtors and  
Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SANTA ROSA DIVISION**

In re:

LEFEVER MATTSON, a California  
corporation, *et al.*,<sup>1</sup>

Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**SUPPLEMENTAL DECLARATION  
OF JOSH H. ESCOVEDO IN  
SUPPORT OF APPLICATION OF  
DEBTORS FOR ORDER  
AUTHORIZING EMPLOYMENT OF  
BUCHALTER, A PROFESSIONAL  
CORPORATION, AS SPECIAL  
LITIGATION COUNSEL**

In re:

KS MATTSON PARTNERS, LP,

Debtor.

[No Hearing Requested]

<sup>1</sup> The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for service is c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The address for service on LeFever Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 9562. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>.

I, Josh H. Escovedo, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a shareholder of Buchalter, A Professional Corporation (“Buchalter”), special litigation counsel to LeFever Mattson, a California corporation, and certain of its affiliates, excluding KSMP, that are the above-captioned debtors and debtors in possession (collectively, the “Debtors” or “LeFever Mattson Debtors”) in these chapter 11 cases (the “Chapter 11 Cases”).

2. I submit this Declaration as a supplement to my declaration dated April 23, 2025 [Dkt. No. 1360] (the “Original Declaration”) in support of the *Application of Debtors for Order Authorizing Employment of Buchalter, a Professional Corporation, as Special Litigation Counsel* [Dkt. No. 1359] (the “Employment Application”).<sup>2</sup> On May 7, 2025, the Court entered the *Order Granting Application of Debtors for Order Authorizing Employment of Buchalter, a Professional Corporation, as Special Litigation Counsel* [Dkt. No. 1401] (the “Employment Order”).

3. The Employment Order authorized the Debtors to employ Buchalter pursuant to section 327(e) of the Bankruptcy Code as special litigation counsel in the Benedetti Litigation.

4. As anticipated in the Original Declaration, this declaration is submitted to supplement information disclosed in the Original Declaration; as additional information regarding parties in interest becomes available, further supplemental declarations will be submitted to the Court reflecting such amended, supplemented or otherwise modified information.

5. Since the filing of the Original Declaration, additional developments in the Chapter 11 Cases require the supplemental disclosures set forth in the following paragraphs.

6. Buchalter is representing Select Portfolio Servicing, Inc. (“SPS”) in its response to certain discovery requests from the official committee of unsecured creditors in these Chapter 11 Cases. SPS is a lender/servicer on various loans secured by 12 properties owned by Debtors LeFever Mattson, a California corporation, and Valley Oak Investments, LP.

7. Buchalter is representing Snegg & Snegg Investments in its potential purchase of the real property located at 4950-4970 Allison Pkwy, Vacaville, California, which is owned by Debtor Windscape Apartments, LLC.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings given to them in the Employment Application.

Josh H. Escovedo